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Magistrate Judge John L. Weinberg

DEC 18 2014

AT SEATTLE
CLERK U.S. DISTRICT COURT
BY WESTERN DISTRICT OF WASHINGTON DEPUTY

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff

NO.

MJ 14-503

COMPLAINT FOR VIOLATION

v.

ROBYN COURTNEY BELL,
Defendant.

BEFORE, JOHN L. WEINBERG, United States Magistrate Judge, U. S. District
Courthouse, Seattle, Washington.

The undersigned complainant being duly sworn states:

COUNT 1

(Possession of Cocaine with Intent to Distribute)

On or about, December 17, 2014, in Blaine, Whatcom County, Washington,
within the Western District of Washington, ROBYN COURTNEY BELL, did knowingly
and intentionally possess, and aid and abet the possession of, with the intent to distribute,
five (5) kilograms and more of a mixture and substance containing cocaine.

All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A),
and Title 18, United States Code, Section 2.

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COMPLAINT / BELL - 1

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970

1 The undersigned complainant, Dave Than, being first duly sworn on oath, deposes
2 and says:

3 **INTRODUCTION**

4 1. I, Dave Than, have been employed as a Special Agent since 2002. I have
5 been a Special Agent with Homeland Security Investigations (HSI) since 2012. Prior to
6 that I was employed by U.S. Immigration & Customs Enforcement (ICE), and U.S.
7 Customs Service (USCS). I'm currently assigned to the Border Enforcement Security
8 Task Force (BEST) at HSI Blaine, Washington. My duties include conducting criminal
9 investigations of the cross border smuggling of narcotics, currency, firearms and aliens. I
10 attended a six month Criminal Investigator Training Program academy at the Federal
11 Law Enforcement Training Center in Brunswick, Georgia. I have been involved in over
12 one hundred criminal narcotics investigations throughout my career. Based on my
13 training and experience, I am familiar with techniques related to, among other things,
14 drug interdiction, drug detection and identification, and the investigation of individuals
15 involved in the smuggling and trafficking of controlled substances.

16 2. The information below is based on my personal knowledge acquired
17 through my investigation and review of relevant reports, in addition to information
18 relayed to me by other law enforcement agents involved in this investigation. I have
19 included only those facts I believe necessary to establish probable cause that ROBYN
20 COURTNEY BELL committed the offense charged in this Complaint. I do not purport
21 to summarize all of the evidence gathered during my investigation, nor have I included
22 all facts known to me or others involved with this investigation.

23 **SUMMARY OF PROBABLE CAUSE**

24 3. On December 17, 2014, U.S. Border Patrol Blaine received information
25 from the Washington State Patrol that an anonymous source of information called into a
26 Washington State Patrol tip-line and reported having seen a grey Volvo XC90 bearing
27 British Columbia, Canada license plate number BC AC953R being loaded with little
28

1 bricks of narcotics into a secret hydraulic compartment under the trunk flooring of this
2 vehicle in or near the Seattle, Washington area.

3 4. On December 17, 2014, at approximately 2130 hours, U.S. Border Patrol
4 units located a grey Volvo XC90 bearing this B.C. license plate near Bellingham,
5 Washington and followed it to the U.S./Canada border at the Pacific Highway Port of
6 Entry. At the Port of Entry, in Blaine, Washington, U.S. Customs and Border Protection
7 Field Operations officers conducted an outbound inspection of the vehicle, as it attempted
8 to cross the international border into Canada. The driver of the vehicle identified herself
9 to agents as ROBYN COURTNEY BELL, a citizen of Canada. BELL was alone in the
10 vehicle, which was registered to her based on documents that were removed from the car.
11 Record checks showed that BELL had entered the United States from Canada earlier the
12 same day, December 17, 2014, at 11:22 a.m., traveling alone in the same grey XC90
13 vehicle.

14 5. A subsequent border inspection of the vehicle led to the discovery of 21
15 vacuum-sealed, kilogram-sized bricks in an after-market hydraulic compartment in the
16 rear of the vehicle. Based on my training and experience, I know the segregation of
17 controlled substances into individually wrapped bricks of approximately one kilogram in
18 weight to be consistent with trafficking and distribution of controlled substances, as
19 opposed to personal use.

20 6. Agents opened one of the bricks and found a white powdery substance,
21 which subsequently field tested positive for cocaine. The total weight of all 21 bricks
22 was approximately 23.2 kilograms. Based upon my training and experience, I know that
23 at this time cocaine is sold in British Columbia, Canada, for approximately \$40,000 to
24 \$50,000 per kilogram. Hence, the cocaine seized from the vehicle driven by BELL could
25 be worth up to \$900,000 if it had successfully been transported into Canada and re-
26 distributed. BELL was arrested by HSI Special Agents and was then transported to the
27 Whatcom County Jail without incident.

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COMPLAINT / BELL - 3

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SEATTLE, WASHINGTON 98101
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CONCLUSION

7. Based on the foregoing, I believe there is probable cause to believe that ROBYN COURTNEY BELL committed the offense charged in this Complaint.


DAVE THAN
Special Agent, HSI

Based on the Complaint and Affidavit sworn to before me, and subscribed in my presence, the Court hereby finds that there is probable cause to believe the Defendant committed the offenses set forth in the Complaint.

Dated this ____ day of December, 2014.


JOHN L. WEINBERG
United States Magistrate Judge